From: MichaelA Flagg To: Flagg, MichaelA

Subject: Fw: OAQPS review of R9 ANP process Date: Wednesday, August 14, 2013 5:26:13 PM

Michael Flagg Air Quality Analysis Office EPA Region 9 415.972.3372

Flagg.MichaelA@epa.gov

--- Forwarded by MichaelA Flagg/R9/USEPA/US on 08/14/2013 05:25 PM -----

From: Matthew Lakin/R9/USEPA/US To: Tim Hanley/RTP/USEPA/US@EPA,

Cc: Dena Vallano/R9/USEPA/US@EPA, Elfego Felix/R9/USEPA/US@EPA, Gwen Yoshimura/R9/USEPA/US@EPA, Katherine

Hoag/R9/USEPA/US@EPA, Laurie Trinca/RTP/USEPA/US@EPA, Lewis Weinstock/RTP/USEPA/US@EPA, Meredith

Kurpius/R9/USEPA/US@EPA, MichaelA Flagg/R9/USEPA/US@EPA

Date: 10/29/2012 12:07 PM

Subject: Re: OAQPS review of R9 ANP process

Tim,

Thank you for the quick response, in the midst of what is obviously a busy time. I know that you just might not be able to provide support sooner, but Debbie Jordan had concerns about our process and was hoping to have a conversation with Chet about this as soon as possible.

As you know, we have a regulatory timeframe of 120 days to act on the plans, which means that our response to about 8 of our 21 plan actions are due Nov. 1. That deadline is probably impossible -- and thus meeting our ACS commitment is shot -- but we are trying to get close to meeting the regulatory requirements, because of the litigation risk. Obviously it would have been better for us to make this request weeks ago, but our own challenging navigation through this issue made it hard to solidify our approach any earlier. We feel that your input and perspective are critical for us to take the most defensible approach.

Maybe we could at least get a meeting on the books with Debbie and Chet for late next week, and then we'll try to slip in a meeting with you for whenever you can make it, but likely next Wednesday? I'll check with Debbie to make sure she is ok with waiting that long.

Thanks, Matt

Matthew Lakin, Ph.D.

Manager, Air Quality Analysis Office

US EPA, Region 9 (AIR-7) | 75 Hawthorne St. | San Francisco, CA 94105

P: 415.972.3851 | E: Lakin.Matthew@epa.gov

Tim Hanley---10/29/2012 11:38:42 AM---From: Tim Hanley/RTP/USEPA/US To: Meredith Kurpius/R9/USEPA/US@EPA,

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Date: 10/29/2012 11:38 AM

## Meredith,

This is really bad week for us as we are working on the PM NAAQS final rule so that it can shared with upper management by the end of the week. Then next week we have visitors from China on Monday and Tuesday.

Next Wednesday or Thursday might work best. Also, would it be worth including Bob Judge or do you just want to keep it small for now?

Tim Hanley Ambient Air Monitoring Group AQAD, OAQPS, OAR, EPA 919-541-4417

## -----Meredith Kurpius/R9/USEPA/US wrote: -----

To: Tim Hanley/RTP/USEPA/US@EPA From: Meredith Kurpius/R9/USEPA/US

Date: 10/29/2012 02:26PM

Cc: Matthew Lakin/R9/USEPA/US@EPA, Elfego Felix/R9/USEPA/US@EPA, Gwen Yoshimura/R9/USEPA/US@EPA, Katherine Hoag/R9/USEPA/US@EPA, MichaelA

Flagg/R9/USEPA/US@EPA, Dena Vallano/R9/USEPA/US@EPA, Laurie Trinca/RTP/USEPA/US@EPA,

Lewis Weinstock/RTP/USEPA/US@EPA Subject: OAQPS review of R9 ANP process

## Tim.

As a result of the SC litigation on our approval of their 2011 annual network plan (ANP), we have revised our network plan process to be more robust and better documented. We have been told by OGC and ORC that to avoid litigation risk, we should not be approving ANP elements that are required to be in the ANP if the information is not in the plan and/or does not meet the requirements of 58.10 or App. A, C, D, or E. Since this is such a big change from our previous approach, and one that may be different from other Regions, our Division Director would like to get input from OAQPS, including Chet, on our approach.

Do you have time to talk some time today or early tomorrow about how to work this up through OAQPS? I have forwarded an email below with the policy document that describes the issue and the policy questions, our revised checklist, and a sample letter template. Please let me know when you have a few minutes to talk. Feel free to pull Lew in if he's available.

## -Meredith

Meredith Kurpius, PhD Air Quality Analysis Office Air Division, US EPA 75 Hawthorne St., AIR-7 San Francisco,CA 94105 415-947-4534 (p) 415-947-3579 (f)